



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION I  
JOHN F. KENNEDY FEDERAL BUILDING  
BOSTON, MASSACHUSETTS 02203-0001

July 12, 1995

Alexander R. Piccioli  
Three-C Electrical Company, Inc.  
190 Pleasant Street  
Ashland, Massachusetts 01721

Subject: Annex 3 Storage Area Decontamination

Dear Mr. Piccioli:

This is in response to your letter dated July 3, 1995 regarding the decontamination of your storage facility located at 190 Pleasant Street. Analytical results for 6 wipe samples collected from a concrete pad were attached. Please note that this office can only address the PCB requirements under the Toxic Substances Control Act (TSCA).

The PCB Spill Cleanup Policy at 40 CFR § 761.125 sets a PCB cleanup standard of  $10 \mu\text{g}/100 \text{ cm}^2$  for nonimpervious solid surfaces (such as concrete, wood and asphalt) in nonrestricted access areas. Based on the information which you provided to us, the decontamination standard of  $10 \mu\text{g}/100 \text{ cm}^2$  for the concrete pad appears to have been met. However, EPA is unable to comment on the work performance (ie., the sampling of the area or the decontamination of the area) since this work was performed under the direction of Three-C. EPA Method 8080 is an acceptable method for the analysis of PCBs.

I hope this answers your request. If you have any additional questions regarding this, please contact me at (617) 565-3257.

Sincerely,

A handwritten signature in cursive script, appearing to read "Kimberly N. Tisa".

Kimberly N. Tisa, PCB Coordinator  
Office of Technical Assistance and Outreach



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July 3, 1995

Attn: Ms. Kimberly N. Tisa  
United States Environmental Protection Agency  
Region 1  
John F. Kennedy Federal Building  
Office of Technical Assistance and Outreach  
Boston, MA 02203-0001

Re: 190 Pleasant Street, Ashland, MA Annex 3 Facility  
"Decontamination Final Status"

Dear Ms. Tisa;

Clean Harbors Environmental Services, Inc. performed a second decontamination cleaning of the Annex 3 facility storage area floor located at 190 Pleasant Street, Ashland, MA on 06/08/95. The wipe sample results were received, and recorded as below 2.0 ug/100 sq cms of PCB concentration levels (below 40 CFR Subpart G Section 671.125.3 standards of 10 ug/100 sq cms).

Enclosed please find the laboratory test results for your review and record. If your office would reply by written letter that EPA acknowledges the work performed, approved the methodology, and that 3/C complied with EPA regulations, it would be appreciated. If you have any further questions, require a site visit, and/or need further documentation, please contact my office as soon as possible.

3/C appreciates your input and EPA's patience in helping us complete this regulatory requirement.

Sincerely,



Alexander R. Piccioli  
President

enc: Clean Harbors, Analysis Report, dated 06/08/95, (10) pages



COPY

REPORT OF ANALYSIS

Clean Harbors Environmental Services, Inc.  
Worcester Service Center  
238A Cherry St.  
Shrewsbury, MA 01545

Project: 3C ELECTRIC  
P.O. #: SB7498

Date Received: 06/08/95  
CHES Lab #: 9506136

Attn: Mr. Peter Joseph

Enclosed are the results for the sample(s) delivered to our laboratory (DEP Laboratory ID# M-MA032) on the date indicated above.

The methods listed represent those methodologies which were used to develop the best analytical techniques. Analytical results and quality assurance protocols are based on these guidelines. These meet the requirements for the reporting of results under the RCRA, NPDES and Safe Drinking Water Act regulations.

Clean Harbors Environmental Services has an active program of quality assurance and quality control. The program closely follows the guidance provided in the EPA Contract Laboratory Program Statement of Work (organic and inorganic), the guidance provided in SW-846, and many other pertinent documents.

Should you have any questions concerning this work, please do not hesitate to contact me.

The information contained in this report is, to the best of my knowledge, accurate and complete.

Per/Date:

*Michael J. Murray* 6/15/95

Michael J. Murray  
Laboratory Manager



Client: Clean Harbors Environmental Services, Inc.  
Sample I.D.: 3C-1, CONCRETE PAD  
Sample Type: Wipe

CHES Lab #: 9506136-01N  
Date Received: 06/08/95

Polychlorinated Biphenyls (PCBs)

Extraction Date: 06/13/95  
Analysis Date: 06/13/95

Parameter	PQL	Concentration	Units
PCB - Aroclor 1016	1.0	ND	ug/100 sq cm
PCB - Aroclor 1221	1.0	ND	ug/100 sq cm
PCB - Aroclor 1232	1.0	ND	ug/100 sq cm
PCB - Aroclor 1242	1.0	ND	ug/100 sq cm
PCB - Aroclor 1248	1.0	ND	ug/100 sq cm
PCB - Aroclor 1254	1.0	ND	ug/100 sq cm
PCB - Aroclor 1260	1.0	ND	ug/100 sq cm

Notes: ND = Below practical quantitation limit (PQL)  
Wipe Area: 400 sq cm

The sample was mixed with hexane for 5 minutes. The resulting extract was analyzed by GC/ECD following EPA Method 8080.



Client: Clean Harbors Environmental Services, Inc.  
Sample I.D.: 3C-2, CONCRETE PAD  
Sample Type: Wipe

CHES Lab #: 9506136-02N  
Date Received: 06/08/95

Polychlorinated Biphenyls (PCBs)

Extraction Date: 06/13/95  
Analysis Date: 06/13/95

Parameter	PQL	Concentration	Units
PCB - Aroclor 1016	1.0	ND	ug/100 sq cm
PCB - Aroclor 1221	1.0	ND	ug/100 sq cm
PCB - Aroclor 1232	1.0	ND	ug/100 sq cm
PCB - Aroclor 1242	1.0	ND	ug/100 sq cm
PCB - Aroclor 1248	1.0	ND	ug/100 sq cm
PCB - Aroclor 1254	1.0	ND	ug/100 sq cm
PCB - Aroclor 1260	1.0	ND	ug/100 sq cm

Notes: ND = Below practical quantitation limit (PQL)  
Wipe Area: 400 sq cm

The sample was mixed with hexane for 5 minutes. The resulting extract was analyzed by GC/ECD following EPA Method 8080.



Client: Clean Harbors Environmental Services, Inc.  
Sample I.D.: 3C-3, CONCRETE PAD  
Sample Type: Wipe

CHES Lab #: 9506136-03N  
Date Received: 06/08/95

Polychlorinated Biphenyls (PCBs)

Extraction Date: 06/13/95

Analysis Date: 06/13/95

Parameter	PQL	Concentration	Units
PCB - Aroclor 1016	1.0	ND	ug/100 sq cm
PCB - Aroclor 1221	1.0	ND	ug/100 sq cm
PCB - Aroclor 1232	1.0	ND	ug/100 sq cm
PCB - Aroclor 1242	1.0	ND	ug/100 sq cm
PCB - Aroclor 1248	1.0	ND	ug/100 sq cm
PCB - Aroclor 1254	1.0	ND	ug/100 sq cm
PCB - Aroclor 1260	1.0	1.6	ug/100 sq cm

Notes: ND = Below practical quantitation limit (PQL)  
Wipe Area: 400 sq cm

The sample was mixed with hexane for 5 minutes. The resulting extract was analyzed by GC/ECD following EPA Method 8080.



Client: Clean Harbors Environmental Services, Inc.  
Sample I.D.: 3C-4, CONCRETE PAD  
Sample Type: Wipe

CHES Lab #: 9506136-04N  
Date Received: 06/08/95

Polychlorinated Biphenyls (PCBs)

Extraction Date: 06/13/95

Analysis Date: 06/13/95

Parameter	PQL	Concentration	Units
PCB - Aroclor 1016	1.0	ND	ug/100 sq cm
PCB - Aroclor 1221	1.0	ND	ug/100 sq cm
PCB - Aroclor 1232	1.0	ND	ug/100 sq cm
PCB - Aroclor 1242	1.0	ND	ug/100 sq cm
PCB - Aroclor 1248	1.0	ND	ug/100 sq cm
PCB - Aroclor 1254	1.0	ND	ug/100 sq cm
PCB - Aroclor 1260	1.0	ND	ug/100 sq cm

Notes: ND = Below practical quantitation limit (PQL)  
Wipe Area: 400 sq cm

The sample was mixed with hexane for 5 minutes. The resulting extract was analyzed by GC/ECD following EPA Method 8080.



Client: Clean Harbors Environmental Services, Inc.  
Sample I.D.: 3C-5, CONCRETE PAD  
Sample Type: Wipe

CHES Lab #: 9506136-05N  
Date Received: 06/08/95

Polychlorinated Biphenyls (PCBs)

Extraction Date: 06/13/95  
Analysis Date: 06/13/95

Parameter	PQL	Concentration	Units
PCB - Aroclor 1016	1.0	ND	ug/100 sq cm
PCB - Aroclor 1221	1.0	ND	ug/100 sq cm
PCB - Aroclor 1232	1.0	ND	ug/100 sq cm
PCB - Aroclor 1242	1.0	ND	ug/100 sq cm
PCB - Aroclor 1248	1.0	ND	ug/100 sq cm
PCB - Aroclor 1254	1.0	ND	ug/100 sq cm
PCB - Aroclor 1260	1.0	1.2	ug/100 sq cm

Notes: ND = Below practical quantitation limit (PQL)  
Wipe Area: 400 sq cm

The sample was mixed with hexane for 5 minutes. The resulting extract was analyzed by GC/ECD following EPA Method 8080.



Client: Clean Harbors Environmental Services, Inc.  
Sample I.D.: 3C-6, CONCRETE PAD  
Sample Type: Wipe

CHES Lab #: 9506136-06N  
Date Received: 06/08/95

Polychlorinated Biphenyls (PCBs)

Extraction Date: 06/13/95  
Analysis Date: 06/13/95

Parameter	PQL	Concentration	Units
PCB - Aroclor 1016	1.0	ND	ug/100 sq cm
PCB - Aroclor 1221	1.0	ND	ug/100 sq cm
PCB - Aroclor 1232	1.0	ND	ug/100 sq cm
PCB - Aroclor 1242	1.0	ND	ug/100 sq cm
PCB - Aroclor 1248	1.0	ND	ug/100 sq cm
PCB - Aroclor 1254	1.0	ND	ug/100 sq cm
PCB - Aroclor 1260	1.0	ND	ug/100 sq cm

Notes: ND = Below practical quantitation limit (PQL)  
Wipe Area: 400 sq cm

The sample was mixed with hexane for 5 minutes. The resulting extract was analyzed by GC/ECD following EPA Method 8080.



QUALITY CONTROL

REPORT OF ANALYSIS

CHES LAB. NO. 9506136

The attached quality control data were generated during the analysis of these samples. All results have been generated in accordance with the procedures as stated in the Clean Harbors Environmental Services, Inc. Quality Assurance/Quality Control Manual and pertinent standard operating procedures, which are available for review. The attached has been submitted for informational purposes only.



Client: Clean Harbors Environmental Services, Inc.

CHES Lab #: 9506136

Polychlorinated Biphenyls (PCBs) Blank

Extraction Date: 06/13/95

Analysis Date: 06/13/95

Parameter	PQL	Concentration	Units
PCB - Aroclor 1016	1.0	ND	ug/100 sq cm
PCB - Aroclor 1221	1.0	ND	ug/100 sq cm
PCB - Aroclor 1232	1.0	ND	ug/100 sq cm
PCB - Aroclor 1242	1.0	ND	ug/100 sq cm
PCB - Aroclor 1248	1.0	ND	ug/100 sq cm
PCB - Aroclor 1254	1.0	ND	ug/100 sq cm
PCB - Aroclor 1260	1.0	ND	ug/100 sq cm

Notes: ND = Below practical quantitation limit (PQL)  
Wipe Area: 400 sq cm

The sample was mixed with hexane for 5 minutes. The resulting extract was analyzed by GC/ECD following EPA Method 8080.



Clean Harbors Analytical Services, Inc., 325 Wood Rd., Braintree, MA 02184		CHAIN OF CUSTODY RECORD		Sample Custodian — (617) 849-1800		Page 1 of 1		
Client: CHES Shrewsbury		Project Name: 3C-Electric		Work Order/P.O. #: SB7498		Date: 6.8.95		
Report To: P. Joseph		Address: Shrewsbury		Phone #: 842-0100		Date Samples Received: 6.8.95		
Date Samples Collected: 6.8.95		by: P. Joseph		Date Samples Received: 6.8.95		Unpreserved		
Airbill/Bill of Lading? Y N		NOTE: Samples received unpreserved will be preserved upon arrival at CHAS. Samples were: Preserved Unpreserved						
Sample I.D.	Sampling Information			Analysis			# of con.	CHAS Sample #
	Date	Time	Station Location	Sample Matrix	PC.B13			
3C-1	6-8	11:00	Carcuter Pad	Wipe	X		1	9506136
3C-2	"	"	"	"	X		1	01N
3C-3	"	"	"	"	X		1	02N
3C-4	"	"	"	"	X		1	03N
3C-5	"	"	"	"	X		1	04N
3C-6	"	"	"	"	X		1	05N
								06N
Relinquished by: <i>[Signature]</i> Date: 6.8.95 Time: 11:30 AM.								
Received by: <i>[Signature]</i> Date: 6.8.95 Time: 11:35 AM.								
Relinquished by: <i>[Signature]</i> Date: 6.8.95 Time: 1:28 PM.								
Received by: <i>[Signature]</i> Date: 6.8.95 Time: 1:35 PM.								
REMARKS/COMMENTS: (Sample storage, nonstandard bottles, cautions, special instructions) WIPE AREA = 400 CM <sup>2</sup>								
Standard laboratory turnaround time is 2 weeks from date of receipt. Accelerated turnaround may be assessed a surcharge.								
Confirmed by: _____ Location of samples: _____								
Turnaround: 24 Hrs. 48 Hrs. 1 Week 2 Weeks Other: <u>2 Weeks</u>								

FFICE COPY

JUN 8 1995

Power Systems Specialists

June 5, 1995

Attn: Ms. Kimberly N. Tisa  
United States Environmental Protection Agency  
Region 1  
John F. Kennedy Federal Building  
Office of Technical Assistance and Outreach  
Boston, MA 02203-0001

Re: 190 Pleasant Street, Ashland, MA Annex 3 Facility  
"Decontamination Status"

Dear Ms. Tisa;

To reiterate our telephone conversation of last week, 3/C had Clean Harbors Environmental Services of Shrewsbury, MA perform decontamination services at our 190 Pleasant Street, Ashland, MA Annex 3 PCB storage facility in May. The wipe test results revealed PCB concentration levels between Non-detectable to 67ug/100 sq cm.

3/C has contacted Clean Harbors to provide decontamination services a second time for washing of the facility storage floor. 3/C requests a time extension to June 30, 1995 to have this work completed. Per 40CFR Subpart G Section 167.125.3(iii), 3/C intends to have the area decontaminated to 10ug/100 sq cm PCB content or below. If you have any questions please contact my office at your convenience.

Sincerely,



Alexander R. Piccioli  
President